



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 26, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Highland Telephone Cooperative (TN)
Study Area Code 290565**

Dear Ms. Dortch:

On behalf of Highland Telephone Cooperative (TN) ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company's outage reporting as required by Section 54.313.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313.



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June 26, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Highland Telephone Cooperative (TN)
Study Area Code 290565
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Highland Telephone Cooperative (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must report outage information which is contained in an attachment to the 2017 ETC Annual Report.
3. The information contained in the attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.
4. With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

Request for Confidentiality

Page 2

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachment is information that is not customarily released to the public. Outage information is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the outage attachment under seal. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁴ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁴ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Dave Crawford
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address: Email of the person identified in data line <030>	dave@highlandtel.net
	Form Type	54.313 and 54.422

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 1 0 7
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext. 280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
290565TN510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	Yes

(600) Functionality in Emergency Situations Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	290565TN610.pdf

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net
<810>	Reporting Carrier	Highland Telephone Cooperative, Inc.
<811>	Holding Company	Highland Telephone Cooperative, Inc. (KY & TN)
<812>	Operating Company	Highland Telephone Cooperative, Inc.

[illegible]

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	290565
<015> Study Area Name	HIGHLAND TEL COOP-TN
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035> Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039> Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP~TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<p><2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.</p> <p><2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.</p> <p><2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.</p> <p><2024A> Round 2 Recipient of Incremental Support?</p> <p><2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.</p> <p><2025A> Round 2 Recipient of Incremental Support?</p> <p><2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).</p> <p><2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)</p>	<div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div>	<div style="border: 1px solid black; height: 60px; width: 150px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 60px; width: 150px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div>
--	---	---

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

<010>	Study Area Code	290565
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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}	290565TN3010.pdf	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	290565TN3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

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(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext. 280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
---	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
--	--	--

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
--	--	--

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	290565
<015> Study Area Name	HIGHLAND TEL COOP-TN
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035> Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.280
<039> Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	HIGHLAND TEL COOP-TN
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/23/2017
Printed name of Authorized Officer:	G Patterson
Title or position of Authorized Officer:	Chief Executive Officer
Telephone number of Authorized Officer:	4236282750 ext.229
Study Area Code of Reporting Carrier:	290565 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	HIGHLAND TEL COOP-TN
Name of Authorized Agent Firm:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/23/2017
Name of Authorized Agent Employee:	Bob Ragsdale
Title or position of Authorized Agent or Employee of Agent	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	7705692105 ext.
Study Area Code of Reporting Carrier:	290565 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

<210> For the prior calendar year, were there any reportable voice service outages?

Yes

<220>

<a>	<b1>	<b2>	<b3>	<b4>	<c1>	<c2>	<d>	<e>	<f>	<g>	<h>
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[illegible]

Highland Telephone Cooperative, Inc.’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65 Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, Highland Telephone Cooperative, Inc. (“Highland”) is not governed by the Rules of the Tennessee Regulatory Authority (“TRA”) for service quality standards and consumer protection rules. However, Highland, in the interest of protecting its own customers, has incorporated consumer protection procedures comparable to those required of incumbent LECs in the State of Tennessee, allowing Highland to meet or exceed existing TRA rules. These procedures include, but are not limited to, the following: (1) publishing the rates, terms, and conditions of service; (2) implementation of anti-slamming and consumer protection procedures; (3) modeling bill presentation to reflect the truth-in-billing requirements;

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

and (4) CPNI, Red Flag Rules, and other applicable federal requirements governing the protection of customers' privacy.

Highland is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in 47 CFR § 8.3. The Company furthermore will comply with all requirements set forth in the 2015 *Open Internet Order* when it becomes effective.

Highland Telephone Cooperative's demonstration of ability to function in emergency situations for voice and broadband services:

Highland Telephone Cooperative, Inc. ("Highland") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)¹. Highland's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). Highland can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Highland to manage traffic spikes throughout its network, as emergency situations require. In addition, Highland has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65 Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, Highland is not governed by the Rules of the Tennessee Regulatory Authority ("TRA"), Chapter 1220-4-2-.23 Emergency Operation. However, in compliance with Federal emergency situation rules, Highland's central offices have adequate provisions for emergency power, a condition allowing them to meet or exceed existing TRA rules for emergency operations. Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Highland has battery backup at all office locations and in its electronic equipment sites. Length of run time is

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as Highland has access to fuel.

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	290565
<015> Study Area Name	HIGHLAND TEL COOP-TN
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035> Contact Telephone Number - Number of person identified in data line <030>	4236282750 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	TN	Huntsville	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	TN	Oneida	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	TN	Robbins	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	TN	Deer Lodge	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	TN	Sunbright	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	TN	Wartburg	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	TN	Petros	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	TN	Oakdale	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	KY	Stearns-Whitley City	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	KY	Pine Knot	30.0	0.0	30.0	15.0	1.0	999999.0	Other, No limit on usage allowance
	TN	Huntsville	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	TN	Oneida	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	TN	Robbins	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	TN	Deer Lodge	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	TN	Sunbright	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	TN	Wartburg	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	TN	Petros	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	TN	Oakdale	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	KY	Stearns-Whitley City	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	KY	Pine Knot	68.0	0.0	68.0	25.0	3.0	999999.0	Other, No limit on usage allowance
	TN	Huntsville	106.0	0.0	106.0	50.0	5.0	999999.0	Other, No limit on usage allowance

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290565
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[illegible]

**GENERAL SUBSCRIBER SERVICES TARIFF
LIFELINE**

Highland Telephone Cooperative
Incorporated

PSC 2
Part II
2nd Revised Sheet 17

- f. The Federal primary interexchange carrier charge (PICC) will not be billed to Lifeline customers who subscribe to toll blocking and do not presubscribe to a long distance carrier.
- g. A Lifeline subscriber's local service will not be disconnected for non-payment of regulated toll charges. Local service may be denied for non-payment of local and miscellaneous service in accordance with Part I of this Tariff. Access to toll service may be denied for non-payment of regulated tolls. A Lifeline subscriber's request for reconnection of local service will not be denied if the service was previously denied for non-payment of toll charges.
- h. Lifeline is not available for resale.

D.8.2.2 Eligibility

- a. To be eligible for a Lifeline credit, a customer must be a current recipient of any one of the following **(T)** programs, or have income at or below 135 percent of the Federal Poverty Guideline [Note 1].
 - 1. Supplemental Security Income (SSI)
 - 2. Food Stamps
 - 3. Medicaid
 - 4. Federal Public housing/Section 8
 - 5. Veterans Pension Benefits **(C)**
 - 6. Survivor Pension Benefits **(C)**
 - 7. **(D)**
- b. All applications for service are subject to verification with the state agency responsible for administration of the qualifying program.

D.8.2.3 Certification

- a. Proof of eligibility in any of the qualifying low income programs should be provided to the Company at the time application for service. The Lifeline credit will not be established until proof of eligibility has been received by the Company. If the customer requests installation prior to the Company's receipt of proof of eligibility, the requested service will be provided without the Lifeline credit. When eligibility documentation is provided subsequent to installation, the Lifeline credit will be provided on a going forward basis.

[Note 1] This provision is effective June 1, 2012.

Issued: October 21, 2016

Effective: December 1, 2016

Issued By: /s/ G. Mark Patterson
G. Mark Patterson, General Manager

By Authority of Order of the Public Service Commission in
Case No. 2016-00059 dated October 19, 2016.

KENTUCKY PUBLIC SERVICE COMMISSION
Talina R. Mathews EXECUTIVE DIRECTOR 
EFFECTIVE 12/1/2016 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Highland Telephone Cooperative (SAC 290565)**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Highland Telephone Cooperative (SAC 290565) hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY